

EXHIBIT 62

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

KEITH FISCHER, MICHAEL O’SULLIVAN,
JOHN MOESER, LOUIS PIA, THOMAS
BARDEN, CONSTANCE MANGAN, and
CHARISE JONES, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

GOVERNMENT EMPLOYEES
INSURANCE COMPANY d/b/a GEICO,

Defendant.

CASE NO. 2:23-CV-02848 (SJB) (SLT)

DECLARATION OF SARAH GREENMAN

I, Sarah Greenman, based on my personal knowledge and pursuant to 28 U.S.C. § 1746, declare as follows:

1. I have been an employee of Government Employees Insurance Company (“GEICO” or the “Company”) since 2005. I currently work for GEICO in its Special Investigations Unit (“SIU”) as an SIU Supervisor.

2. I have worked for the Company as an SIU Major Case Supervisor since October 2023 and then transitioned into a SIU Field Supervisor in March 2024 and currently hold that role today. Prior to 2023, I was an Audit Supervisor for former Region 8. In October 2023, I took over supervising only a few SIU investigators who were previously assigned to former Region 2.

3. In my role since October 2023, I supervised multiple SIU investigators. My investigators worked either in the field or remotely from home. I currently supervise

investigators that worked in the former Region 2 and former Region 8 who were assigned to the Woodbury and Buffalo offices, respectively.

4. Starting in October of 2023, for my New York investigators, they investigated automobile fraud in New York and ultimately, the territory was divided so the northern New York investigators regularly investigated northern New York claims and the southern New York investigators regularly investigated southern New York claims.

5. Prior to May 2023, I reported to Patricia Woupio, former SIU Manager for former Region 8. From May 2023 to October 2023, I was responsible for SIU auditing and training, reporting to Jerry Malon. In October 2023, I began reporting and continue to report to Rene Cubas, Jr., current SIU Manager.

6. Since October 2023, I work 100% remote from my home. I do not regularly see my investigators in-the-field.

JOB RESPONSIBILITIES

7. Since October 2023, in my current role, my job responsibilities include assigning cases to my investigators, approving cases worked, coaching and training them, approving their time off requests, and participating in management meetings, among other things.

8. The investigators that I supervised include Albert Brust, Ted Wendling, Craig Costanzo and Maria Munoz. I currently supervise Craig Costanzo, who previously reported to SIU Supervisor Andrew Gelderman, and he transitioned to reporting to me in March 2024.

WORK HOURS / TIMEKEEPING OF SIU INVESTIGATORS

9. The investigators I supervised had a regular work schedule of Monday through Friday, 7.75 hours per day, totaling 38.75 hours per work week.

10. My investigators determined if they needed to flex time, which if so, they would have to notify me of their proposed scheduled days and times, and I would approve their schedule and flex time.

11. Work hour flexibility was at the discretion of each investigator's supervisor, and I almost always allowed all of the investigators that I supervised to flex their work hours within each work week as they needed, as long as their weekly work hours totaled 38.75.

12. In my experience, my investigators reported to me they enjoyed the flexibility provided by this practice; the expectation of my investigators is to flex their time instead of working overtime. I do not recall ever denying a request by any SIU investigator in any role to "flex" their hours within the same work week.

13. My investigators have always been responsible for ensuring that they properly and accurately enter all their time worked for GEICO, including all hours beyond 38.75 in a work week and all overtime hours worked over 40 in a work week. To my knowledge, my investigators used GEICO's Workday application on their phones if they were field investigators. If they were desk investigators, they would only use their desktop.

14. All hourly investigators were required to clock-in and out. All salaried investigators were not required to clock-in and out. Both hourly and salaried employees were required to enter all time into GEICO timekeeping system, Workday.

15. Since October 2023, I do not recall any of my investigators asking to work overtime and most flexed their time. In addition, if any of my investigators needed assistance with matters, I would step-in to assist on case tasks.

16. If my investigators asked for overtime between 1-2 hours a week, I would approve overtime requests without the need for SIU Manager approval.

17. I told my investigators to always enter all of their time worked so that they could be properly compensated for all such time – including the occasions that required overtime hours worked over 40 in a given work week.

18. I never told my investigators to work off-the-clock; I never told my investigators that they would not be paid for all their hours worked.

19. None of my investigators, including Opt-In Plaintiffs Craig Costanzo and Maria Munoz, ever complained about being forced to work off-the clock or not being properly paid for all of the hours they worked or submitted to GEICO as having worked. In fact, Ms. Munoz is known to precisely track her hours.

20. I have never been told by my managers, including Patricia Woupio, Rene Cubas, Jr., or anyone else at GEICO, to not permit my investigators to log all of their overtime hours. My managers consistently reinforce that all investigators need to enter all time worked into Workday.

21. GEICO forbids its employees from working off the clock.

PERFORMANCE

22. Since supervising SIU investigators in New York in October 2023, I regularly had one-on-one meetings with my investigators every week where we would discuss their cases, workload and how I could assist them in working to complete their cases.

23. The majority of my investigators balance their workload and travel time well. For my field investigators, they would be assigned roughly 8 cases a week and desk investigators would be assigned roughly 12 cases a week. These numbers would wax and wean dependent upon other investigators who took time off, the type of investigation, whether there was any weather-related issues and the like.

24. With respect to investigators' performance, I generally evaluate their productivity and quality of investigations. I would receive generated reports twice a week that identified my investigators' new assignments, case closures and quality rating. I would use this information in my one-on-ones to help my investigators understand their ongoing performance feedback.

PARTICIPATION

25. I am providing this statement of my own free will. I have not been threatened, coerced, or in any way intimidated by GEICO or its attorneys concerning any aspect of this declaration.

26. I understand and acknowledge that GEICO will not retaliate or take any negative action against me for making this declaration or for not making this declaration, if I elect not to make it.

27. I have not been promised anything in exchange for making this declaration and understand that I will not be subject to favoritism or receive any benefit from GEICO for providing this declaration.

I declare under penalty of perjury that the foregoing is true and correct.

May 12, 2025

Date

DocuSigned by:

Sarah Greenman

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Sarah Greenman